

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT**

**IN THE MATTER OF:**

GARY M MASSEY,  
JACQUELINE E MASSEY  
Debtors.

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CHAPTER 13  
CASE NO. 13-47598-SWR  
JUDGE STEVEN W RHODES

**TRUSTEE'S OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN**

**NOW COMES** the Chapter 13 Trustee, Krispen S. Carroll, and objects to confirmation of the Chapter 13 Plan in the above matter pursuant to E. D. Mich. LBR 3015-3(a) as follows:

1. Trustee requires an update at confirmation as to the status of debtor wife's employment.
2. Trustee objects to debtors' proration of the unemployment income over the life of the Plan as it affects the feasibility of debtor's Chapter 13 Plan pursuant to 11 U.S.C. § 1325(a)(6).
3. Trustee requires language in any Order Confirming Plan that the dividend to unsecured creditors shall be no than \$5,580.00 as required by the Liquidation Analysis of the Chapter 13 Plan.

**WHEREFORE**, the Chapter 13 Trustee prays this Honorable Court deny confirmation of the debtors' Chapter 13 Plan.

OFFICE OF THE CHAPTER 13 TRUSTEE-DETROIT  
Krispen S. Carroll, Chapter 13 Trustee

June 20, 2013

/s/ Margaret Conti Schmidt  
KRISPEN S. CARROLL (P49817)  
MARGARET CONTI SCHMIDT (P42945)  
MARIA GOTSIS (P67107)  
719 Griswold Street  
Suite 1100  
Detroit, MI 48226  
(313) 962-5035  
notice@det13ksc.com

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**CERTIFICATE OF MAILING**

I hereby certify that on the date indicated below, I electronically filed **TRUSTEE'S OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN** with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

ROBERT B REIZNER  
605 W MICHIGAN AVE  
JACKSON, MI 49201-0000

and I hereby certify that I have mailed by United States Postal Service the above mentioned documents to the following non-ECF participants:

GARY M MASSEY  
JACQUELINE E MASSEY  
3054 W BERRY ROAD  
RIVES JUNCTION, MI 49277-0000

June 21, 2013

\_\_\_\_\_/s/ Barbara A. Ecclestone  
Barbara A. Ecclestone  
For the Office of the Chapter 13 Trustee-Detroit  
719 Griswold Street  
Suite 1100  
Detroit, MI 48226  
(313) 962-5035  
notice@det13ksc.com